

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

TYRONE JOHNSON,

PLAINTIFF,

VS.

CITY OF OLYMPIA, CITY OF OLYMPIA
POLICE DEPARTMENT, RYAN DONALD
individually, in his official capacity and on
behalf of his marital community with his
spouse, Jane or John Doe (1) GEORGE
CLARK individually, in his official capacity,
and on behalf of his marital community with
his spouse, Jane or John Doe (2), JONATHAN
HAZEN individually, in his official capacity
and on behalf of his marital community with
his spouse, Jane or John Doe (3), ERIC
HENRICHSEN individually, in his official
capacity and on behalf of his marital
community with his spouse, Jane or John Doe
(4), MATTHEW RENSCLER individually, in
his official capacity, and on behalf of his
marital community with his spouse, Jane or
John Doe (5), RANDY WILSON individually,
in his official capacity, and on behalf of his
marital community with his spouse, Jane or
John Doe (6), DOES 7-12, ABC CORP., AND
XYZ CORP. (fictitious names whose identities
are presently unknown).

DEFENDANTS.

CASE NO: 3:17-CV-05403-MJP

STIPULATION AND ORDER FOR
TRIAL CONTINUANCE AND NEW
DISCOVERY SCHEDULE

IT IS HEREBY STIPULATED by and between Beverly Grant and Elizabeth Lunde, counsel for Plaintiff herein, and John Justice, counsel for Defendants herein, that the trial of the above entitled matter may be continued from July 23, 2018 to October 1, 2018, or others date as set by the Court, and a proposed continuance of remaining case deadlines as follows:

| Description | Current Dates | Proposed Dates | New Dates By Order of the Judge |
|---|---------------|--------------------------------------|---------------------------------|
| All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR 7(d)) | 1/24/18 | 3/23/18 | |
| Discovery Completed by | 2/23/18 | 4/27/18 | |
| All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR 7(d)) | 3/26/18 | 5/25/18 | |
| All motions in limine must be filed by and noted on the motion calendar no earlier than the third Friday thereafter and no later than the Friday before the pretrial conference | 6/18/18 | 8/17/18 | |
| Agreed pretrial order due | 7/11/18 | 9/17/18 | |
| Trial briefs, proposed voir dire questions, and proposed jury instructions: | 7/11/18 | 9/17/18 | |
| Pretrial conference | 7/13/18 | Set by court depending on trial date | |
| Trial Date | 7/23/18 | Set by court | |

The primary reasons necessitating continuance are that Plaintiff's counsel has been required to address an emergent health issue requiring surgery that made completion of discovery difficult, if not impossible, prior to the discovery cutoff of February 23, 2018. Plaintiff's counsel, Elizabeth

1 Lunde, was injured on November 4, 2017, which has caused delays and requires her to undergo
2 surgery on January 5, 2018, which will entail a 6-week recovery period. Plaintiff's counsel can
3 provide the Court additional information regarding these medical issues, if requested.

4 Stipulated to this 3rd day of January, 2018.

5 BEVERLY GRANT LAW FIRM, P.S.

6 /s/Elizabeth Lunde

7 Elizabeth G. Lunde, WSBA No. 51565

8 Beverly Grant, WSBA No. 8034

9 Attorneys for Plaintiff

10 LAW, LYMAN, DANIEL, KAMERRER
& BOGDANOVICH, P.S.

11 /s/John E. Justice

12 John E. Justice, WSBA No. 23042

13 Attorney for Defendant

ORDER

THIS MATTER having come on before the above-entitled court upon stipulation of counsel, the court having examined the records and being fully advised in the matter, now, therefore,

IT IS HEREBY ORDERED that the trial of the above-entitled cause shall be continued from July 23, 2018 to October 15, 2018. The remaining dates are continued as follows:

| Description | Current Dates | Proposed Dates | New Dates By Order of the Judge |
|---|---------------|--------------------------------------|---------------------------------|
| All motions related to discovery must be filed by and noted on the motion calendar on the third Friday thereafter (see CR 7(d)) | 1/24/18 | 3/23/18 | 4/18/2018 |
| Discovery Completed by | 2/23/18 | 4/27/18 | 5/18/2018 |
| All dispositive motions must be filed by and noted on the motion calendar on the fourth Friday thereafter (see CR 7(d)) | 3/26/18 | 5/25/18 | 6/18/2018 |
| All motions in limine must be filed by and noted on the motion calendar no earlier than the third Friday thereafter and no later than the Friday before the pretrial conference | 6/18/18 | 8/17/18 | 9/10/2018 |
| Agreed pretrial order due | 7/11/18 | 9/17/18 | 10/3/2018 |
| Trial briefs, proposed voir dire questions, and proposed jury instructions: | 7/11/18 | 9/17/18 | 10/3/2018 |
| Pretrial conference | 7/13/18 | Set by court depending on trial date | 10/5/2018 at 1:30 PM |
| Trial Date | 7/23/18 | Set by court | 10/15/2018 at 9:00 AM |

DONE this 9th day of January, 2018.



Marsha J. Pechman
United States District Judge

Presented by:

Approved as to form and notice of presentation
waived:

BEVERLY GRANT LAW FIRM, P.S.

LAW, LYMAN, DANIEL, KAMERRER
& BOGDANOVICH, P.S.

/s/Elizabeth Lunde

Beverly Grant, WSBA No. 8034
Elizabeth Lunde, WSBA No. 51565
Attorneys for Plaintiff

/s/John E. Justice

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